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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII
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DENVER, COLORADO 80202-2466

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ENVIRONMENTAL PROTECTION AGENCY

Ref: 8HWM-FF

Mr. Joe Schieffelin
Colorado Dept. of Human Health & Environment
4300 Cherry Creek Drive South
Denver, CO 80220

RE: OU 4 Draft Phase II Work
Plan

Dear Mr. Schieffelin:

The purpose of this letter is to transmit EPA's comments and those of our contractor (PRC) on the referenced document. Overall, the document failed to present rationale for the proposed field investigation. Also, the risk assessment section needs to be revised extensively to evaluate the risks considering post-closure conditions. EPA suggests that DOE submit a Technical Memorandum (TM) addressing our comments and specifying the rationale for the new proposed field activities.

If you have any questions or comments, please contact Arturo Duran of my staff at 294-1080.

Sincerely,

Martin Hestmark, Manager
Rocky Flats Project

Enclosures

- cc: Frazer Lockhart, DOE
- Randy Ogg, EG&G
- Gary Baughman, CDH
- Harlan Ainscough, CDH
- Arturo Duran, EPA

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ADMIN RECORD

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EPA's Comments on the Phase II Work plan
for OU 4, the Solar Evaporation Ponds

- It is our understanding that DOE is not planning to move forward with the proposed field sampling plan (FSP) until geoprobe studies are conducted at the OU 4 area. DOE staff has indicated that the geoprobe studies are necessary to better delineate preferential ground water flows and select adequate well locations. The FSP for the geoprobe studies have been provided to the regulatory agencies. In order to minimize schedule impacts, EPA suggests that DOE move forward with the implementation of the geoprobe studies as soon as possible. DOE should modify the phase II FSP and resubmit it to EPA and CDH via Technical Memorandum (TM). The TM should incorporate the results of the geoprobe studies and should specify any changes in the FSP. Also, the TM should include a rationale for the number and location of the new wells.
- EPA presently feels that the proposed four unweathered bedrock wells are not sufficient to fully characterize the unweathered bedrock at OU 4. The revised FSP should reassess the number and location of unweathered bedrock wells.
- It is unclear how information on previous groundwater sampling efforts was utilized to design the proposed FSP. The revised FSP should specify the relationship between previous sampling efforts and the proposed groundwater investigation.
- The risk assessment section should be revised to evaluate the risks at OU 4 considering post-closure conditions. The risk assessment should assess the risks associated with any contamination remaining in the soils outside the cover system (i.e., soils within the seeps area), as well as ground water contamination. This information can be provided via Technical Memorandum (TM).
- The data quality objectives and field sampling plan will need to be modified or revised based on the geoprobe studies results.
- The analytical list should be revised to incorporate analysis for F039 waste. An explanation or rationale for deleting or adding analytes from the list should be presented in the work plan.